

# UNITED STATES DISTRICT COURT

for the

Southern District of Mississippi

United States of America

v.

CARL REDDIX

Defendant

Case No. 3:16cr50DPJ-FKB

## SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS IN A CRIMINAL CASE

Mississippi Department of Corrections, Attorney General Jim Hood, P. O. Box 220, Jackson, Ms. 39205-1510,  
To: 601-359-3441

(Name of person to whom this subpoena is directed)

**YOU ARE COMMANDED** to produce at the time, date, and place set forth below the following books, papers, documents, data, or other objects:  
Prison audits from the Mississippi Department of Health, Mississippi Board of Nursing, Mississippi Board of Medical Licensure and the Mississippi Pharmacy Board for each facility where a private vendor provided medical services from 2007 to the present.

Place: Honorable Daniel Jordan, U.S. District Court Judge  
United States Courthouse  
501 E. Court Street, Suite 5.750  
Jackson, MS 39201-5032

Date and Time: March 20, 2017, 5 p.m.

Certain provisions of Fed. R. Crim. P. 17 are attached, including Rule 17(c)(2), relating to your ability to file a motion to quash or modify the subpoena; Rule 17(d) and (e), which govern service of subpoenas; and Rule 17(g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

(SEAL)

Date: **MAR - 8 2017**

ARTHUR JOHNSTON  
CLERK OF COURT

Signature of Clerk or Deputy Clerk

The name, address, e-mail, and telephone number of the attorney representing (name of party)  
Counsel for Carl Reddix, P.O. Box 11264, Jackson, Ms. 39283-1264

Lisa M. Ross,

, who requests this subpoena, are:

### Notice to those who use this form to request a subpoena

Before requesting and serving a subpoena pursuant to Fed. R. Crim. P. 17(c), the party seeking the subpoena is advised to consult the rules of practice of the court in which the criminal proceeding is pending to determine whether any local rules or orders establish requirements in connection with the issuance of such a subpoena. If no local rules or orders govern practice under Rule 17(c), counsel should ask the assigned judge whether the court regulates practice under Rule 17(c) to 1) require prior judicial approval for the issuance of the subpoena, either on notice or ex parte; 2) specify where the documents must be returned (e.g., to the court clerk, the chambers of the assigned judge, or counsel's office); and 3) require that counsel who receives produced documents provide them to opposing counsel absent a disclosure obligation under Fed. R. Crim. P. 16.

Please note that Rule 17(c) (attached) provides that a subpoena for the production of certain information about a victim may not be issued unless first approved by separate court order.

**EXHIBIT A**

## UNITED STATES DISTRICT COURT

for the

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OBJECTS IN A CRIMINAL CASEMississippi Department of Corrections, Attorney General Jim Hood, P. O. Box 220, Jackson, Ms. 39205-1510,  
To: 601-359-3441

(Name of person to whom this subpoena is directed)

**YOU ARE COMMANDED** to produce at the time, date, and place set forth below the following books, papers, documents, data, or other objects:

To produce the personnel files of Former Commissioner Christopher Epps and all complaints (extortion, bribery, kickbacks, abuse of authority) filed by inmates, family members of inmates, staff and vendors against Former Commissioner Christopher Epps with MDOC, the Equal Employment Opportunity Commission and the Department of Labor from 2002 until November of 2014

Place: Honorable Daniel Jordan, U.S. District Court Judge  
United States Courthouse  
501 E. Court Street, Suite 5.750  
Jackson, MS 39201-5032

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To: 601-359-3441

(Name of person to whom this subpoena is directed)

**YOU ARE COMMANDED** to produce at the time, date, and place set forth below the following books, papers, documents, data, or other objects:  
All contracts from the Mississippi Department of Correction sent to the Contract Review Board for approval and all documents that show what action, if any, the Contract Review Board took on the contracts sent to the board by the Mississippi Department of Corrections.

Place: Honorable Daniel Jordan, U.S. District Court Judge  
United States Courthouse  
501 E. Court Street, Suite 5.750  
Jackson, MS 39201-5032

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(SEAL)

Date: **MAR - 8 2017**

ARTHUR JOHNSTON

CLERK OF COURT

*N. Dean*

Signature of Clerk or Deputy Clerk

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Counsel for Carl Reddix, P.O. Box 11264, Jackson, Ms. 39283-1264

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OBJECTS IN A CRIMINAL CASEMississippi Department of Corrections, Attorney General Jim Hood, P. O. Box 220, Jackson, Ms. 39205-1510,  
To: 601-359-3441

(Name of person to whom this subpoena is directed)

**YOU ARE COMMANDED** to produce at the time, date, and place set forth below the following books, papers, documents, data, or other objects:  
To produce all vendor complaints against Former Commissioner Christopher Epps from 2002 until November of 2014

Place: Honorable Daniel Jordan, U.S. District Court Judge  
United States Courthouse  
501 E. Court Street, Suite 5.750  
Jackson, MS 39201-5032

Date and Time: March 20, 2017, 5 p.m.

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(SEAL)

Date: MAR - 8 2017

ARTHUR JOHNSTON

CLERK OF COURT

N. Oca

Signature of Clerk or Deputy Clerk

The name, address, e-mail, and telephone number of the attorney representing (name of party) Lisa M. Ross,  
Counsel for Carl Reddix, P.O. Box 11264, Jackson, Ms. 39283-1264, who requests this subpoena, are:

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To: 601-359-3441

(Name of person to whom this subpoena is directed)

**YOU ARE COMMANDED** to produce at the time, date, and place set forth below the following books, papers, documents, data, or other objects:  
To produce all reports from the Mississippi Department of Corrections's Medical Compliance Staff related to services provided by all vendors who contracted to provide medical services at any MDOC facility from 2002 until November of 2014

Place: Honorable Daniel Jordan, U.S. District Court Judge  
United States Courthouse  
501 E. Court Street, Suite 5.750  
Jackson, MS 39201-5032

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Mississippi Department of Corrections, Attorney General Jim Hood, P. O. Box 220, Jackson, Ms. 39205-1510,  
To: 601-359-3441

(Name of person to whom this subpoena is directed)

**YOU ARE COMMANDED** to produce at the time, date, and place set forth below the following books, papers, documents, data, or other objects:

To produce all Requests for Proposals to provide medical services at any Mississippi Department of Corrections facility from 2010 through 2016, all vendors responses, all rating sheets completed by the RFP committees, and the names of all individuals who served on the committees that reviewed and selected the medical providers who responded to the Requests for Proposals.

Place: Honorable Daniel Jordan, U.S. District Court Judge  
United States Courthouse  
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Jackson, MS 39201-5032

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To: 601-359-3441

(Name of person to whom this subpoena is directed)

**YOU ARE COMMANDED** to produce at the time, date, and place set forth below the following books, papers, documents, data, or other objects:  
To produce the invoice and payment history for Health Assurance, LLC., Wexford, Centurion, GEO Group and CCA from 2010 to the present; all contracts with Health Assurance, LLC, Wexford, Centurion, GEO Group and CCA from 2010 to the present; all MDOC vendors from 2010 to the present; all contracts let by MDOC from 2010 to the present.

Place: Honorable Daniel Jordan, U.S. District Court Judge  
United States Courthouse  
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To: 601-359-3441

(Name of person to whom this subpoena is directed)

**YOU ARE COMMANDED** to produce at the time, date, and place set forth below the following books, papers, documents, data, or other objects:  
Prison audits from the Mississippi Department of Health, Mississippi Board of Nursing, Mississippi Board of Medical Licensure and the Mississippi Pharmacy Board for each facility where a private vendor provided medical services from 2007 to the present.

Place: Honorable Daniel Jordan, U.S. District Court Judge  
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To: 601-359-3441

(Name of person to whom this subpoena is directed)

**YOU ARE COMMANDED** to produce at the time, date, and place set forth below the following books, papers, documents, data, or other objects:  
To produce all vendor proposals to provide medical services at any Mississippi Department of Corrections Facility from 2010 until the present

Place: Honorable Daniel Jordan, U.S. District Court Judge  
United States Courthouse  
501 E. Court Street, Suite 5.750  
Jackson, MS 39201-5032

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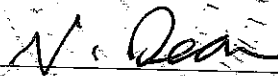
(SEAL)

Date:

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Signature of Clerk or Deputy Clerk

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## PROOF OF SERVICE

This subpoena for (name of individual and title, if any) Attorney General Jim Hood  
was received by me on (date) 3/8/17.

☒ I served the subpoena by delivering a copy to the named person as follows: Kristen Garuchou, Attorney General's Office, 550 High St., 12th Floor, Jackson, MS  
on (date) 3/8/17; or

☐ I returned the subpoena unexecuted because: \_\_\_\_\_

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also  
tendered to the witness fees for one day's attendance, and the mileage allowed by law, in the amount of  
\$ \_\_\_\_\_.

My fees are \$ \_\_\_\_\_ for travel and \$ \_\_\_\_\_ for services, for a total of \$ 0.00.

I declare under penalty of perjury that this information is true.

Date: 3/8/17

Vanessa Howell  
Server's signature

Vanessa Howell  
Printed name and title

3746 Woodrow Wilson, Jackson MS 39216  
Server's address

Additional information regarding attempted service, etc.: